

PRIVACY NOTICE

Controller	Teräselementti Oy
	Marjamäentie 16
	37570 Lempäälä, Finland
Updated on	21 May 2018
Contact person in matters concerning the register	Ville Helenius
	ville.helenius@teraselementti
	+358 (0)3 253 6200
Name of the register	Customer and marketing register
Purpose of and legal basis for the processing of personal data	<p>Personal data is processed in order to manage and analyse customer relationships and other appropriate connections, to produce services and to develop and plan business operations as well as for the purposes of marketing, distance selling, opinion and market research and customer communication which can be carried out in electronic and targeted format.</p> <p>The legal basis for the processing of personal data is a contractual relationship or the legitimate interest of Teräselementti Oy.</p>
Data content of the register	<p>The following data of all data subjects can be processed in the register:</p> <ul style="list-style-type: none"> • first and last name • contact details (postal address, telephone number, email address) • the starting and ending date and method of the customer relationship and/or appropriate connection • direct marketing permits and objections • Business ID • data on the use of electronic services and contents (e.g. subscriptions to newsletters) • data related to marketing and sales promotion, such as marketing measures directed at the data subject and their participation in them <p>In addition to the data mentioned above, we may process the following data:</p> <ul style="list-style-type: none"> • customer number • Business ID or personal identity code • invoicing and debt collection data • contact persons (name, telephone, email) • data connected to the management, communication and classification of a customer relationship and other appropriate connection (information on the purchase and cancellation of products and services, delivery information, feedback, complaints and customer service event records, such as emails and support messages)
Regular sources of data	Personal data is collected directly from the data subject, from different services used by the data subject (including the Teräselementti Oy website) and in connection with various marketing measures. Personal data can also

	<p>be collected and updated from the registers of Teräselementti Oy's partners and from authorities and companies that provide services concerning personal data.</p>
<p>Technical and administrative protection measures</p>	<p>A. Manual material Personal data is protected against unauthorised access and unlawful processing (e.g. loss, alteration or disclosure). Each processor is only allowed to process personal data that they need for their work. Documents are stored in locked premises protected from third parties. Documents are printed only if necessary and paper printouts are subsequently destroyed.</p> <p>B. Electronic material Electronically processed data contained in the register is protected with firewalls, passwords and other technical measures that are generally acceptable in the field of data security.</p> <p>Data contained in the register can only be accessed with an access right granted by the controller to specified employees of the controller or employees of companies operating by order and on behalf of the controller.</p>
<p>Duration of processing</p>	<p>Teräselementti Oy retains personal data only for as long as is necessary for the indicated purposes of use or in order to fulfil legal obligations. When personal data collected by us is no longer needed, we will destroy or erase it in a secure manner.</p>
<p>Regular disclosures and transfers of data</p>	<p>In principle, personal data is processed by Teräselementti Oy employees when performing their work tasks.</p> <p>Data may be transferred to the controller's select partners who process data on behalf of the processor, in which case we will ensure by contractual arrangements that personal data is processed in accordance with valid data protection legislation and otherwise appropriately.</p> <p>We may also disclose data in a manner required by competent authorities or other bodies in accordance with valid legislation.</p> <p>Data may be disclosed to buyers in connection with business restructuring, if Teräselementti Oy sells or otherwise reorganises its business operations.</p>
<p>Data transfers outside the EU</p>	<p>Data is transferred regularly outside the EU in accordance with GDPR requirements. The adequate level of protection is ensured by using the European Commission's standard contractual clauses.</p>

<p>Rights of the data subject</p>	<p>The data subject has the following rights, the exercise of which must be applied for using the address given in the section Inspection and rectification requests.</p> <p>Right to inspect data The data subject has the right to inspect personal data stored in the register.</p> <p>Right to rectify data The data subject has the right to request that any inaccurate or incomplete information concerning them is rectified.</p> <p>Right to object to processing The data subject has the right to object to the processing of their personal data if they feel that the data has been processed unlawfully.</p> <p>Right to object to processing for direct marketing purposes The data subject has the right to object to the processing of their personal data for direct marketing purposes.</p> <p>Right to erasure The data subject has the right to request that their personal data is erased if processing is not necessary. We will process the erasure request and either remove the data or provide a legitimate reason for not being able to do so.</p> <p>Withdrawal of consent When the processing of personal data is solely based on the data subject's consent, the data subject has the right to withdraw that consent.</p> <p>Right to appeal to the Data Protection Ombudsman The data subject has the right to demand that we restrict the processing of contested data until the matter has been solved.</p> <p>Right to lodge a complaint The data subject has the right to lodge a complaint with the Data Protection Ombudsman if they feel that we are processing personal data in violation of data protection regulations.</p> <p>Inspection and rectification requests Please note that, due to legal or other rights and obligations, the controller may legitimately refuse to rectify or erase data, to restrict processing or to transfer data from one system to another.</p> <p>The inspection and rectification request must identify the relevant piece of personal data and provide the name of the register in question.</p> <p>The written and signed request must be sent by email to the</p>
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	address: tietosuoja@teraselementti.fi .
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<p>Automated decision-making and profiling</p>	<p>The processing of personal data does not include automated decision-making and profiling.</p>
<p>Automated data collection</p>	<p>Teräselementti Oy utilises commonly used digital marketing methods and tools when collecting data on how you use our website. This data is collected in order to improve the usability and content of our site, to target advertising and marketing and to find out the interests of our visitors. In principle, cookies (see below) collect data that cannot be connected to individual persons.</p> <p>Cookies are small text files that include character strings and allow us to identify browsers. The site or a third party sends it to a user's computer. The use of cookies is governed by laws such as Section 205 of the Information Society Code that states that the user must be given comprehensible and complete information on cookies, the saving of usage data and their purpose of use.</p> <p>Most internet browsers accept cookies automatically. However, you can change your browser settings to block third-party cookies or notify of them.</p> <p>We use cookies on our website to better understand what type of content is of interest to our visitors.</p> <p>Cookies also help us improve the user experience of our site. Analytics help us quickly discover errors on our site, such as faulty links. The data can also be used to improve our advertising.</p> <p>We do not identify visitors based on cookies on our site, as we do not use cookies to collect personal data, such as the name, address or telephone number of a user.</p>

	<p>Our site does not require registration, nor do we collect log-in data of our clients through our site.</p> <p>Data collected by cookies:</p> <ul style="list-style-type: none"> • access time • duration of visit • pages viewed • browser type • whether the user has visited our site before • source of visitor traffic • customer ID (individual ID created by Google Analytics)
<p>Notification of a personal data breach</p>	<p>To the controller The processor shall notify the controller without undue delay after becoming aware of a personal data breach. The notification shall describe the nature of the personal data breach and the measures taken as required by law.</p> <p>To the data subject The controller shall communicate the personal data breach to the data subject when it is likely to result in a high risk to the rights and freedoms of the data subject. The notification shall describe the nature of the personal data breach and the measures taken as required by law.</p> <p>To the Data Protection Ombudsman The controller shall notify the personal data breach to the supervisory authority not later than 72 hours after having become aware of it if the personal data breach is likely to result in a risk to the rights and freedoms of natural persons. The notification shall describe the nature of the personal data breach and the measures taken as required by law.</p>
<p>Changes to the privacy notice</p>	<p>Teräselementti continuously develops its business and reserves the right to change this privacy notice by communicating about it in its electronic services and in connection with other communications. These changes may be based on legislative amendments and the implementation of the resulting requirements.</p>